

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
FT. LAUDERDALE DIVISION**

**CASE NO.: 9:22-cv-80824-RS**

NELSON FERNANDEZ,

Plaintiff,

v.

LEADER'S HOLDING COMPANY,  
a Florida for-profit corporation,

Defendant.

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**DEFENDANT LEADER'S HOLDING COMPANY'S  
THIRD UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant Leader's Holding Company ("Leaders" or "Defendant"), by its counsel in this regard, and pursuant to Local Rule 7.1, submits its Motion for Extension of Time to Respond to Plaintiff's Complaint until August 11, 2022, and in support of its Motion states as follows:

1. On June 6, 2022, Plaintiff filed his Complaint in this matter which contains claims arising under Title III of the federal Americans with Disabilities Act.
2. On or about June 9, 2022, Plaintiff served the Complaint on Defendant.
3. On July 21, 2022, this Honorable Court granted Defendant's second motion for an extension of time to respond to the Complaint until July 21, 2022.

4. Defendant requires additional time to complete their investigation and to prepare its responsive pleading because due to pre-planned vacations of Defendant and counsel followed by disruptions due to Covid-19. Defendant's counsel is currently concluding their investigation of Plaintiff's allegations and requires additional time to explore settlement and prepare its responsive pleading.

5. As such, Defendant respectfully requests a brief extension of time, up to and including August 11, 2022, within which to respond the Plaintiff's Complaint.

6. Pursuant to Federal Rule of Civil Procedure 6(b)(1)(B), "[w]hen an act may or must be done within a specified time, the court may, for good cause, extend the time."

7. In this case, Plaintiff will not be prejudiced by the delay, which will be minimal and will have no impact on the judicial proceedings.

8. This Motion is not being submitted for the purpose of undue delay or for any improper purpose. The relief requested in this Motion will not unduly prejudice Plaintiff or the Court. In addition, it is Defendant's understanding that this Motion will not impact any existing scheduling dates or prejudice any of the parties to this litigation.

**CERTIFICATION OF EFFORTS TO CONSULT COUNSEL REGARDING  
EXTENSION OF TIME TO RESPOND TO COMPLAINT**

9. Pursuant to Local Rule 7.1(a)(3), undersigned counsel has conferred with the Plaintiff's counsel regarding the relief requested in this motion, and the Plaintiff's counsel has stated that he has no objection to the extension of time.

WHEREFORE, Defendant Leader's Holding Company respectfully submits its Motion for an Extension of Time to Respond to Plaintiff's Complaint and respectfully requests until August 11, 2022, to submit its answer or other responsive pleading to Plaintiff's Complaint.

Dated: August 4, 2022.

Respectfully Submitted,

FISHER & PHILLIPS LLP

By: **s/ Andrew Froman**

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**CERTIFICATE OF SERVICE**

I certify that on this 4<sup>th</sup> day of August 2022, I electronically filed the foregoing pleading with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of the filing to all attorneys of record.

**s/ Andrew Froman**  
Andrew Froman, Esq.